

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

\$14,030.00 IN UNITED STATES
CURRENCY,

Defendant.

Civil Action No. 2:25cv833

VERIFIED COMPLAINT FOR FORFEITURE

AND NOW comes the United States of America, by and through its counsel, Troy Rivetti, Acting United States Attorney for the Western District of Pennsylvania, and Jill L. Locnikar, Assistant United States Attorney for the Western District, and respectfully represents as follows:

1. This is a civil action *in rem* for forfeiture to the United States of \$14,030.00 in United States currency (the “Defendant Currency”) pursuant to 21 U.S.C. § 881(a)(6).

2. Jurisdiction is predicated upon 28 U.S.C. §§ 1345 and 1355(a).

3. Venue is proper under 28 U.S.C. §§ 1395 and 1355(b).

4. On February 4, 2025, U.S. Postal Inspection Service (“USPIS”) in the Western District of Pennsylvania identified a Priority Mail parcel, bearing tracking number 9505514988975034480712 (the “Subject Parcel”), as suspicious and interdicted the Subject Parcel from the Cambridge Springs, PA 16403 Post Office.

5. Upon examination of the Subject Parcel, Inspectors determined that it possessed characteristics consistent with the mailing of illicit narcotics and/or drug proceeds.

6. The Subject Parcel weighed approximately 2 pounds, 5.9 ounces, bore \$19.15 in U.S. postage and was hand-addressed to “Monsoon Group” at “3859 S. Valley View Blvd., #2-250, Las Vegas, NV 89103” from “David Keag” at “32873 Brown Hill Rd., Union City, PA 16438.”

7. Narcotics traffickers will often hand write the labels attached to the mail piece instead of using a pre-printed label, as is customary with most legitimate businesses utilizing the Priority Mail Express or Priority Mail service.

8. The Subject Parcel’s mailing zip code (16403) was different from the zip code listed on the return address portion of the express mail label (16438). Narcotics traffickers will often mail parcels at different post offices to avoid detection.

9. On February 4, 2025, Inspectors researched an electronic database that has proven reliable in previous investigations in determining the legitimacy of name, address, and phone number information, concerning the Subject Parcel’s return address of “32873 Brown Hill Road, Union City, PA 16438.” This address was valid and associated with “David Keag.”

10. On February 4, 2025, Inspectors also researched the address “3859 S. Valley View Blvd., #2-250, Las Vegas, NV 89103” using an electronic database that has proven reliable in previous investigations in determining the legitimacy of name, address, and phone number information. This address was valid and associated with “Monsoon Group.”

11. A trend is emerging in cases involving the sale of narcotics where traffickers use good addresses and/or good names on shipping labels. Further, individuals without criminal histories, are often used to receive parcels containing cash or money orders (proceeds of the sale of controlled substances), or contraband for a fee or as a favor on behalf of the actual perpetrator.

Traffickers then arrive to retrieve the item after delivery; the trafficker is either at the location at the time of delivery or has the recipient bring the item to the trafficker.

12. On February 10, 2025, Inspectors subjected the Priority Mail parcel to a standard K-9 search. Ohio Township (Pennsylvania) Police Department Officer E. Wallace assisted with certified drug detection K-9 “Larry.” Individuals who regularly handle controlled substances often leave the scent of controlled substances on the box and other packaging materials they handle. Packaging materials are often stored near the controlled substances, transferring the odor to the packaging materials. Narcotic canines are trained to alert on these substances. Officer Wallace’s K-9 alerted on the Subject Parcel.

13. On February 10, 2025, Inspectors called (814)-***-1088 and spoke with David Keag (“Keag”) regarding Priority Mail parcel 9505514988975034480712. Inspectors asked Keag what was inside Priority Mail parcel 9505514988975034480712 and Keag responded, “\$14,000.00.” Inspectors asked Keag what the money was for and Keag stated he had a gambling problem. Inspectors asked for consent to open the parcel and Keag agreed.

14. Upon opening the Subject Parcel, Inspectors found a USPS small flat rate box. Inside the box was an item wrapped in tin foil and a black Mylar bag. Inspectors discovered the Defendant Currency within the tin foil and black Mylar bag.

15. There were no notes, receipts, or instructions in the Subject Parcel. Inspectors know from training and experience that individuals who traffic controlled substances rarely include any type of instruction with proceeds. Legitimate businesses or personal gifts contain notes, letters, receipts, cards, or coupons with the cash or monetary instruments.

16. The Defendant Currency consisted of six hundred ninety-nine (699) \$20 bills, and one (1) \$50 bill. The respective currency denominations and the manner in which the

Defendant Currency was bundled are indicative of how narcotics traffickers conduct their business. Postal Inspectors have found, in most cases, narcotics payments have been primarily in twenty-dollar denominations. Inspectors noted the currency in this parcel is consistent with narcotics trafficking.

17. On February 12, 2025, Inspectors performed a review of postal business records revealing the Priority Mail parcel containing the Defendant Currency and mailed by Keag to Las Vegas had connections to two parcels that were mailed from Las Vegas to Union City, PA. According to records, Priority Mail parcels 9505510047565036379387 and 9505514719015036348091 are linked to 9505514988975034480712, the Defendant Currency, by the same IP address of 108.147.174.98.

18. Priority Mail parcel 950551047565036379387 has a return address of “Lisa Garcia, 1123 Athens Avenue, Las Vegas, NV 89121” and destination address of “Paul King, 35774 Circuit Drive, Union City, PA 16438.” According to a law enforcement database, “35774 Circuit Drive” is a valid address in the 16438-zip code. The database did not associate the name “Paul King” to “35774 Circuit Drive” address, but did associate the name “Paul Keag.” The law enforcement database revealed the return address “1123 Athens Avenue, Las Vegas, NV 89121 does not exist.

19. Priority Mail parcel 9505514719015036348091 has a return address of “Lisa Garcia, 1123 Athens Avenue, Las Vegas, NV 89121” and destination address of “Miranda Higley, 23934 Wilkins Road, Union City, PA 16438.” According to a law enforcement database, “23934 Wilkins Road” is a valid address in the 16438-zip code. The database did not associate the name “Mirada Higley” to “23934 Wilkins Road.”

20. On February 19, 2025, a review of an investigative report from February 2024 revealed six (6) previous mailings that were classified as suspect in United States currency mailings. Four (4) of these mailings originated from Erie, PA 16501. One (1) mailing originated from Waterford, PA 16441 and David Keag was the sender. One (1) mailing originated from Cambridge Springs, PA 16403 and David Keag was the sender. All suspect United States currency mailings were destined to “3859 S. Valley View Blvd., Las Vegas, NV 89103.”

21. Based on the above-described investigation, USPIS determined that the Defendant Currency was intended to be furnished in exchange for a controlled substance and/or represented proceeds of unlawful drug transactions.

22. The Defendant Currency was therefore seized by USPIS pursuant to 21 U.S.C. § 881(a)(6).

23. Following the seizure, USPIS instituted administrative forfeiture proceedings against the Defendant Currency pursuant to 21 U.S.C. § 881 because it was furnished or intended to be furnished in exchange for a controlled substance and/or constitutes proceeds traceable to an exchange for a controlled substance and/or was intended to be used to facilitate any such violation of the Controlled Substances Act. During the administrative proceedings, Keag filed a claim to the Defendant Currency. As a result, the United States has instituted this civil forfeiture action against the Defendant Currency.

24. By reason of the foregoing, and under the provisions of 21 U.S.C. § 881(a)(6), the Defendant Currency is forfeitable to the United States.

WHEREFORE, the United States respectfully requests that process of warrant *in rem* issue for the arrest of the Defendant Currency; that Judgment of Forfeiture be entered in favor of the United States for the Defendant Currency; and that the United States be granted such relief as this Court may deem just and proper, together with the costs and disbursements of this action.

Respectfully submitted,

TROY RIVETTI
Acting United States Attorney

/s/ Jill L. Locnikar

JILL L. LOCNIKAR
Assistant U.S. Attorney
Joseph F. Weis, Jr. U.S. Courthouse
700 Grant Street, Suite 4000
Pittsburgh, PA 15219
(412)894-7429
(412)644-6995 (fax)
jill.locnikar@usdoj.gov
PA ID No. 85892 (AFF)

VERIFICATION

I am an Inspector with the United States Postal Inspection Service, and the case agent assigned to this case.

I have read the contents of the foregoing complaint for forfeiture, and the statements contained therein are true and correct to the best of my knowledge and belief.

I verify under penalty of perjury that the foregoing is true and correct.

Executed on this 17th day of June, 2025.

A handwritten signature in black ink, appearing to read "B. Dodd", is written over a horizontal line.

Brian Dodd, Inspector
United States Postal Inspection Service